

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

THE BOEING COMPANY EMPLOYEE  
RETIREMENT PLANS MASTER TRUST  
and THE BOEING COMPANY EMPLOYEE  
SAVINGS PLANS MASTER TRUST,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC.; J. MICHAEL  
PEARSON; HOWARD B. SCHILLER;  
ROBERT L. ROSIELLO; TANYA CARRO;  
and PRICEWATERHOUSECOOPERS,

Defendants.

Civil Action No. 17-7636 (MAS) (LHG)

STIPULATION AND ORDER

WHEREAS, Plaintiffs in the above-captioned action have filed a Complaint against Valeant Pharmaceuticals International, Inc., J. Michael Pearson, Howard B. Schiller, Robert L. Rosiello, Tanya Carro, and PricewaterhouseCoopers LLP (together, “Defendants,” and together with Plaintiffs, the “Parties”);

WHEREAS, counsel for Defendants have agreed to accept service of the Complaint;

WHEREAS, counsel for the Parties have conferred and agreed to adopt the existing briefing schedule as ordered by the Court in *Lord Abbett Investment Trust v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6365(MAS)(LHG) (Dkt. No. 8) for the above-captioned case and *The Public Employees’ Retirement System of Mississippi v. Valeant Pharmaceuticals International Inc., et al.*, No. 17-cv-7625(MAS)(LHG) for any motion(s) to dismiss that Defendants may file as their response to the Complaint; and

WHEREAS, counsel for the Parties have conferred and agreed that, in the interest of efficiency, in support of and opposition to any such motion to dismiss, the Parties will submit omnibus briefs covering the motions filed in this case, *The Public Employees' Retirement System of Mississippi v. Valeant Pharmaceuticals International Inc., et al.*, No. 17-cv-7625(MAS)(LHG), and *Lord Abbett Investment Trust v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6365(MAS)(LHG).

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of the Parties, as follows:

- (a) All Defendants will have until October 23, 2017 to answer, move to dismiss, or otherwise respond to the Complaint;
- (b) In the event any of the Defendants move to dismiss the Complaint, Plaintiffs will then have until December 22, 2017 to oppose any such motions to dismiss, and the Defendants will then have until January 29, 2018 to file any replies in support of their motions to dismiss;
- (c) Each Party shall submit omnibus briefs in support of or in opposition to the motions filed in this case, *The Public Employees' Retirement System of Mississippi v. Valeant Pharmaceuticals International Inc., et al.*, No. 17-cv-7625(MAS)(LHG), and *Lord Abbett Investment Trust v. Valeant Pharmaceuticals International, Inc., et al.*, No. 17-cv-6365(MAS)(LHG).

So Ordered this 18<sup>th</sup> day  
of October, 2017  
Michael Shipp  
Hon. Michael Shipp, USDJ

Stipulated and agreed to by:

DATED: October 17, 2017

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